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Hon. Arlene Lindsay  
United States District Court  
Eastern District of New York  
814 Federal Plaza  
Central Islip, New York 11722  
**Filed via ECF**

December 14, 2022

**RE: Fausto Delgado vs. All Shore Marine Construction Inc.**  
**Docket No. 2:22-cv-00340-AMD-ARL (Request to Amend the Complaint)**

Dear Judge Lindsay:

Plaintiff requests leave to amend the complaint. Plaintiff seeks leave to amend in order to add an additional plaintiff to this matter and end this matter's status as a collective action.

Upon conducting further research, we have discovered an additional Plaintiff. The same research has also revealed that it is not prudent to continue this matter as a collective action.

Lastly, Plaintiff seeks leave to amend in order to assert a claim of retaliation. This claim is based upon information and evidence not present when Plaintiff filed the original complaint.

I thank the Court for its attention to this matter.

Respectfully,

/S/  
Lawrence Spasojevich, Esq.  
*Attorney for Plaintiff*